

Fact Sheet



For Draft/Proposed Significant Modification / Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10300006-2011**

Application Received: **November 11, 2010 (SM02) / January 20, 2011(renewal)**

Plant Identification Number: **10300006**

Permittee: **Dominion Transmission, Inc.**

Facility Name: **Hastings Compressor Station**

Mailing Address: **445 West Main Street**

Clarksburg, WV 26301

Physical Location: Pine Grove, Wetzel County, West Virginia
UTM Coordinates: 528.64 km Easting • 4377.66 km Northing • Zone 17
Directions: From Clarksburg take Route 20 North approximately 37 miles to Hastings. Station is on left side of the road.

Facility Description

Hastings Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. This facility (compressor station) includes three adjacent facilities covered by one Title V permit:

- 1) Hastings Station – production facility,
- 2) Mockingbird Hill Station (underlying permit - R13-2555A) – transmission facility,
- 3) Lewis Wetzel Station (underlying permit - R13-2870, recently issued) – transmission facility.

It consists of the following equipment: two (2) 500 HP Cooper GMXE-6 engines, one (1) 3,550 HP Caterpillar Model 3612 Compressor Engine, one (1) 530 HP Cummins Model KTA19SLB Auxiliary Generator, three (3) 80 HP Capstone Microturbines, one (1) 8175 HP Solar Taurus 60 Turbine, one (1) 1.25 MMBtu/hr and one (1) 4.5 MMBtu/hr natural gas fired boilers, one (1) 7.5 mmscf/day glycol dehydration unit with flare, one (1) 0.38 MMBtu/hr reboiler, one (1) 10.0 MMBtu/hr pipeline heater, ten (10) storage tanks of various sizes, and one (1) natural gas fired auxiliary generator rated at 350HP for emergency use.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	179.82	33.55
Nitrogen Oxides (NO _x)	316.05	192.93
Particulate Matter (PM ₁₀)	14.50	4.48
Total Particulate Matter (TSP)	14.50	4.48
Sulfur Dioxide (SO ₂)	1.14	0.07
Volatile Organic Compounds (VOC)	269.89	34.30
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2009/2010 Actual Emissions
Hastings Station HAPs*	21.4	6.7
Mockingbird Hill Station HAPs*	0.3	0.3
Lewis Wetzel Station HAPs*	10.6	n/a
Total HAPs	32.3	7.0
Speciated Significant HAPs*	Potential Emissions	2009/2010 Actual Emissions
Acrolein	0.92	0.2
Acetaldehyde	1.56	0.5
Benzene	2.69	0.48
Ethylbenzene	0.67	0.64
Formaldehyde	10.56 **	1.5
n-Hexane	2.53	0.37
Xylene	7.69	4.66
Toluene	5.06	1.57

Some of the above HAPs may be counted as PM or VOCs.

* Included in Total HAPs above

** Formaldehyde PTE for Lewis Wetzel Station is 8.3 TPY

Title V Program Applicability Basis

This facility has the potential to emit 316.05 tons of NO_x, 179.82 tons of CO and 269.89 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60, Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
	40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
State Only:	40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2555A	May 21, 2007	
R13-2870	February 14, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The following are changes/additions to the most recent Title V permit for this facility:

1. Emission Units Table was rearranged per each compressor station (Hastings, Mockingbird Hill and Lewis) for more usefulness for the facility personnel.
2. Requirements 3.1.9 and 3.5.10 - applicable requirements of 45CSR42, *Greenhouse Gas Emissions Inventory Program*, have been incorporated into the renewal permit under these conditions.
3. Requirement 3.1.11 – former requirement 4.1.1 (45CSR§2-3.1) was moved to facility-wide Section 3, because it is applicable to the following units at all three Stations – Hastings, Mockingbird Hill and Lewis:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity
005-01*	HTR01	Heater; Natco 96x30	1977	10.0 MMBtu/hr
005-02*	RBR01	Reboiler; Natco 5GR-375-DX5	1972	0.38 MMBtu/hr
005-04*	BLR02	Boiler; Cleaver Brooks MTF700-1250-60	2004	1.25 MMBtu/hr
005-05*	BLR05	Bryan Model RV 450W-FDG Boiler	2011	4.5 MMBtu/hr

* This equipment burns or combusts pipeline quality natural gas only.

Current Fact Sheet for the permit states that “according to 45 CSR §2-11, RBR01 & BLR02 are exempt from MRR (Monitoring, recordkeeping and reporting) requirements because RBR01 & BLR02’s heat input is less than ten (10) million B.T.U’s per hour”. The newly added boiler BLR05 (R13-2870) has input less than 10 million B.T.U’s per hour, therefore it should be exempt as well. Also, the Fact Sheet says: “According to 45CSR2A, Heater (HTR01) is exempt from 45CSR2 monitoring because HTR01 combusts only natural gas”. The following table sets out the pertinent sections of 45CSR2 for further analysis.

Rule Section	Rule Language
45CSR§2-3.1. 10% opacity limit	No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [RBR01, BLR02, BLR05 and HTR01]
45CSR§2-3.2.	Compliance with the visible emission requirements of subsection 3.1 shall be

Rule Section	Rule Language
Means of demonstrating compliance with the opacity limit	determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. [RBR01, BLR02, BLR05 and HTR01]
45CSR§2-8.1.a. Testing	The owner or operator of a fuel burning unit(s) shall demonstrate compliance with section 3 by periodic testing in accordance with 40 CFR Part 60, Appendix A, Method 9, or a certified continuous opacity monitoring system, as approved by the Director.... [RBR01, BLR02, BLR05 and HTR01]
45CSR§2-11.1. Exemptions	Any fuel burning unit(s) having a heat input under ten (10) million B.T.U.'s per hour will be exempt from sections 4, 5, 6, 8 and 9. However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date. [RBR01, BLR02, BLR05]
45CSR§2A-3.1. Applicability (Testing, Monitoring, Recordkeeping and Reporting Requirements under 45CSR2)	This rule applies to any fuel burning unit(s) having a design heat input (DHI) over ten (10) million BTU/hr (mmBTU)... [HTR01]

The language of 45CSR§2-3.1. specifies the opacity limitation that applies to boilers RBR01, BLR02, BLR05 and heater HTR01, and it set forth as permit condition 3.1.11.

The language of 45CSR§2-3.2. specifies the two acceptable means of demonstrating compliance with the opacity limit in 45CSR§2-3.1, but *does not require* that Method 9 tests be performed or that a COMS be installed and utilized. This subsection only prescribes the methods.

The language of 45CSR§2-8.1.a. would be the requirement to perform testing (i.e., Method 9) or employ a COMS. When applicable, this subsection *requires* the testing or COMS utilization.

The language of 45CSR§2-11.1. is an exemption to sections 4 (weight emission standards), 5 (fugitive PM), 6 (registration), 8 (testing and MRR) and 9 (startups, shutdowns, malfunctions) of 45CSR2 for units less than 10 MMBtu/hr design heat input (DHI).

The language in 45CSR§2A-3.1 exempts fuel burning units with DHI at or under ten (10) million BTU/hr from testing and MRR of 45CSR2.

Since RBR01, BLR02 and BLR05 meet the exemption criteria in 45CSR2, they are not subject to monitoring in 45CSR§2-8, which is also consistent with the current Title V permit. Since HTR01 meets the exemption criteria in 45CSR2A (based on the DHI of 10 MMBtu/hr) , it is not subject to testing and MRR, which is also consistent with the current Title V permit.

4. Requirement 3.4.4, applicable to AUX02, AUX03, AUX04, BLR02 and TUR02 of Mockingbird Hill Station, was also found applicable to BLR05 of Lewis Station to demonstrate compliance with fuel consumption limit in set forth in requirement 9.1.4. Therefore it was left in the facility-wide Section 3.
5. Requirement 5.1.5 was revised for clarification purposes.
6. Requirement 5.1.8 - former requirement 3.1.17 (45CSR§10-5.4) was moved to DEHY Section (Section 5) since it is only applicable to DEHY01 and DEHY units (as compliance demonstration with the requirement 5.1.7 (45CSR§10-5.1)).
7. Requirements 5.1.9, 5.3.2 and 5.4.2 were added to include applicable provisions of the Part 63 Subpart HH “National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities”. The subpart was not applicable before, because at that time it only covered major sources of HAPs. The facility is not a major source for purposes of this subpart - only HAPs emissions of the production facility (Hastings Station) are considered, and they were below 25 TPY in 2009 and 2010. In 2007, the subpart was revised to include provisions for area sources of HAPs as well. Per §63.760(b)(2),

“for area sources, the affected source includes each triethylene glycol (TEG) dehydration unit...”, therefore the subpart became applicable to the Dehydration Unit (DEHY01).

Per §63.760(f)(5), the compliance date for the applicable provisions of this subpart was no later than January 5, 2009 since “the facility is not located in an Urban-1 county, as defined in §63.761” and “not located within any UA plus offset and UC boundary”, and construction commenced before July 8, 2005 (requirement 5.1.9).

The company claims “benzene exemption” per §63.764(e)(1)(ii): “the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year” (requirement 5.1.9). This is supported by the data from the report of wet natural gas sampling, sent in per requirement 5.5.2: in 2010 benzene emissions from the production facility were 0.485 tpy. Therefore, the company is only required to do “*Determination of glycol dehydration unit flow rate or benzene emissions*” per §63.772(b)(2) (requirement 5.3.2), and maintain records as per §63.774(d)(1) (requirement 5.4.2). Requirement 5.1.10 was included to indicate that, if in the future, Dehydration Unit benzene emissions will equal or exceed 0.90 megagram per year (1 tpy), the company would be not exempted, and become a subject to 40 C.F.R. §63.764(d)(2).

Monitoring requirement 5.2.1 was revised to add compliance demonstration with the Subpart HH benzene exemption, claimed in requirement 5.1.9.

Compliance demonstration language was added to testing requirement 5.3.2 to state that compliance will be demonstrated with this Subpart HH requirement, if it is demonstrated with the existing and more detailed monitoring requirement 5.2.1 and testing requirement 5.3.1.

8. Requirement 5.5.2 was revised to allow more time for sufficient monitoring data collection in the year of wet gas analysis.
9. Requirement 5.4.3 was added to specify details of requirement 5.4.2 (area source recordkeeping provisions of 40C.F.R. §63.774 (d)(1)(ii) for demonstrating compliance with the “less than 1 tpy benzene exemption). Therefore, compliance demonstration streamlining language was added to this requirement to state that compliance with it will demonstrate compliance with requirement 5.4.2.
10. Section 6.0 was added to include provisions of Part 63 Subpart ZZZZ “*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*” applicable to reciprocating internal combustion engines (RICE) at the Hastings Station:

Engine	Design Capacity	Ignition	Use/Type	Year installed	Source of HAP emissions
EN01	500 HP	Spark (SI)	Non-emergency, non-black start, 2SLB	1968 (existing)	Area source*
EN02	500 HP	Spark (SI)	Non-emergency, non-black start, 2SLB	1968 (existing)	Area source*
AUX01	350 HP	Spark (SI)	Emergency, non-black start	1968 (existing)	Area source*

* According to 40CFR63 Subpart ZZZZ, ‘major source of HAP emissions’ is defined as a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site. Therefore, since three (3) stations (Hastings, Mockingbird Hill and Lewis Wetzel) are located on separate surface sites, HAP emissions from these facilities are not aggregated in determining NESHAP major source

applicability, but individually evaluated for major HAP source determination. This results in the Hastings Station being an area source of air toxics (as well as Mockingbird Hill and Lewis Wetzel Stations).

Because of type and size of engines, only work and management practices are applicable from Table 2d (requirement 6.1.1), and Table 2b (numerical emission standards) is not applicable. Since AUX01 is “an existing stationary emergency RICE”, and EN01, EN02 and AUX01 are existing stationary RICES that are “not subject to any numerical emission standards”, notification requirements in §63.6645(a) are not applicable. Initial performance test is not required for engines EN01 and EN02 since they are not CI (Table 5 is not applicable), and no subsequent testing is required per §63.6615 (Table 3 is not applicable). Compliance should be demonstrated by monitoring (requirement 6.2.1), recordkeeping (requirement 6.4.1) and reporting (requirement 6.5.1).

11. Requirements 7.4.1 and 9.4.1 were included to reference applicable requirement 3.4.4 from the facility-wide Section 3.
12. Requirements for Mockingbird Hill Station (former 3.1.11 through 3.1.16, 3.3.2 through 3.3.4, 3.5.10 and 3.5.11) were moved from the facility-wide Section 3 to the Source-Specific Section 7.
13. Section 8.0 was added to include requirements for Lewis Compressor Station’s Engines EN03 and AUX05 (based on of recently issued underlying Permit R13-2870).
14. Requirement 8.1.7 was added to include Part 63 Subpart ZZZZ provision applicable to engine EN03 and auxiliary generator AUX05 (see table below). Per §63.6590(a)(2)(iii), these SI engines are considered new units (area source units constructed on or after June 12, 2006). Therefore, per §63.6590(c)(1), they are only subject to Part 60 Subpart JJJJ requirements (included in Section 8 of the permit).

Engine	Design Capacity	Ignition	Use/Type	Year installed	Source of HAP emissions
EN03	3,550 HP	Spark (SI)	Non-emergency, 4SLB	2011 (new)	Area source
AUX05	530 HP	Spark (SI)	Emergency, 4SLB	2011 (new)	Area source

15. Requirements for Lewis Compressor Station’s Boiler BLR05 were added under Section 9.0 (based on recently issued underlying Permit R13-2870).
16. Requirement 9.1.3 – fuel use limit was added for Boiler BLR05 in order to demonstrate compliance with the emission limits in requirement 9.1.2. The emission limits in 9.1.2 were established in permit R13-2870 and are based on maximum quantity of fuel (natural gas) combusted at maximum design capacity of 4.5 MMBtu/hr. Meeting the fuel use limit will also meet emission limits in 9.1.2. Recordkeeping of quantity of natural gas burned according to Section 3.4.4 will show compliance with requirement 9.1.3 (recordkeeping requirement 3.4.4 was revised to include recordkeeping for Boiler BLR05 fuel consumption).

The natural gas consumption limit was calculated in the following way:

$$4.5 \text{ MMBtu/hr} / 1,020 \text{ BTU/cu ft} = 4,412 \text{ cu ft/hr or } 4,412 \text{ cu ft/hr} \times 8760 \text{ hr/yr} = 38.65 \times 10^6 \text{ cu ft/yr}$$

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. Part 60 Subpart JJJJ “*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*” is not applicable to turbine TUR02 because it is a combustion turbine, and doesn’t meet definition of an internal combustion engine:

“§ 60.4248 What definitions apply to this subpart?”

Stationary internal combustion engine means any internal combustion engine, except combustion turbines, that converts heat energy into mechanical work and is not mobile... Stationary ICE include reciprocating ICE, rotary ICE, and other ICE, except combustion turbines.”

2. Part 63 Subpart ZZZZ “*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*” is not applicable to auxiliary generators AUX02, AUX03 and AUX04 because they are all micro-turbines, not reciprocating engines.
3. Part 60 Subparts KKKK “*Standards of Performance for Stationary Combustion Turbines*” and Subpart GG “*Standards of Performance for Stationary Gas Turbines*” are not applicable to auxiliary generators/micro-turbines AUX02, AUX03 and AUX04, because they are below applicable size threshold (10 MMBTU/hr).
4. Part 60, Subpart GG “*Standards of Performance for Stationary Gas Turbines*” is not applicable to turbine TUR02 because it was installed in 2008 (after February 18, 2005). Therefore, it is subject to Subpart KKKK applicable to units constructed after February 18, 2005.
5. Part 63, Subpart HH “*National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*” is not applicable to Mockingbird Hill and Lewis Wetzel Stations because they are transmission facilities.
6. Part 63 Subpart HHH “*National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*” is not applicable because it only could be applicable to a dehydration unit located at Hastings Station, but this station is a production facility, not a transmission and storage facility. Another reason of non-applicability is that facility is not a major source of HAPs.
7. Part 63 Subpart DDDDD “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*” is not applicable to boilers and a heater because each of them are located at minor sources of HAPs.
8. Part 63 Subpart JJJJJ “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*” is not applicable to boilers and a heater because of the following reasons stated in the table below:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Part 63 Subpart JJJJJ Applicability
005-01*	HTR01	Heater; Natco 96x30	1977	10.0 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)
005-02*	RBR01	Reboiler; Natco 5GR-375-DX5	1972	0.38 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)
005-04*	BLR02	Boiler; Cleaver Brooks MTF700-1250-60	2004	1.25 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)

005-05*	BLR05	Bryan Model RV 450W-FDG Boiler	2011	4.5 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)
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* This equipment burns or combusts pipeline quality natural gas only.

9. R13-2870 requirements 6.1.2 (45CSR§2-3.2) and 6.2.1 (based on 45CSR§2-8.1.a) were left out of this permit because of boiler BLR05 heat input is 4.5 MMBtu (under 10 MMBtu). See item (3) in the Determination and Justification section for more information.
10. R13-2555A requirements 4.1.7 (45CSR§10-5.1) and 4.1.8 (45CSR§10-5.4) were left out of the permit, because they are not applicable to auxiliary generators AUX01, AUX02 and AUX03, boiler BLR02 and turbine TUR02, because they are not used for primary purpose of producing heat or power by indirect heat transfer, therefore they can't be defined as "fuel burning unit" per 45CSR§10-2.8.
11. From current Fact Sheet:
 - 40 CFR 64 - Engines do not have any control; Glycol Dehydration unit is not a major source of HAPs. Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.
 - 40 C.F.R § 60.18 – Flare is used only to control the odor. Even without flare the facility is not a major source of HAPs. Therefore, 40 C.F.R § 60.18 is not applicable.
12. The following R13-2870 requirements were not included in the permit:
 - a) 7.1.2 through 7.1.4 (40 C.F.R. 60 Subpart JJJJ §60.4230(a) , (c), (e) and (f)) because they are statements of applicability, and not applicable requirements.
 - b) 7.2.2 (40 C.F.R. 60 Subpart JJJJ §60.4233(f)) - because it is not applicable to the engines EN03 and AUX05 since these are new engines, not modified or reconstructed.
 - c) 7.3.3 (40 C.F.R. 60 Subpart JJJJ §60.4236(e)) – this is applicable only to engines modified or reconstructed, therefore it is not applicable to EN03 and AUX05.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: May 18, 2011
Ending Date: June 17, 2011

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

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Division of Air Quality
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Response to Comments (Statement of Basis)

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.